VAMHCS RESEARCH SERVICE HOT TOPIC

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Follow Your Research Protocol!!!!

Investigators and staff frequently do not follow their approved protocols!!!!

This is a recurring finding of compliance audits conducted on UM and VAMHCS studies. This finding is consistent whether the audits are conducted by the VAMHCS ORC, the UMB HRPO (IRB), and even the UMSOM ACUO (IACUC).

FAILURE TO FOLLOW A RESEARCH PROTOCOL ***AS APPROVED BY THE IRB, IACUC, SRS, IBC AND R&D*** **COMMITTEE** IS A SERIOUS ISSUE AND MAY EVEN CONSTITUTE ***SERIOUS NONCOMPLIANCE.***

The Bottom Line:

- **Do what you said you were going to do when you submitted your protocol in BRAAN and/or CICERO, and the VAMHCS R&D Committee (RDC).**
- **Do it in the way that you described in BRAAN/CICERO and the VAMHCS RDC.**
- **Do NOT do ANYTHING that is not in BRAAN/CICERO and the VAMHCS RDC.**
- **If something in your BRAAN/CICERO materials needs to be done differently, then amend your protocol with the IRB ("modification request") or apply to the IRB for a protocol exception BEFORE you actually do the change.**
- **The only exception to this is if the change must be done urgently in order to protect the life or safety of the participant(s). In that case, you MUST notify the IRB immediately.**
- **As soon as your amendment or exception is approved by the IRB, submit it to the R&D Committee (RDC). (In most cases you will be able to proceed with your change immediately!)**

- **The same basic rules apply to animal and lab studies as well.**

- This applies to ALL the information that you submitted when you applied for approval of your protocol, including the materials sent to: the IRB (CICERO or BRAAN), the VAMHCS R&D Committee (RDC) (additional VA documentation), the UMB Institutional Biosafety Committee (IBC) (CICERO), the VAMHCS Subcommittee on Research Safety (SRS) (Research Protocol Safety Survey ["RPSS form"]), the UM SOM Institutional Animal Care and Use Committee (IACUC) for your Animal Use Protocol (AUP), the "Animal Component of Research Protocol" (ACORP) for VA funding of animal research.

- You are probably aware that you must apply for protocol modifications when you have major or obvious changes like: changes that the study sponsor requires, changes in drug dosage or administration, changes in invasive or radiographic procedures, etc.
  However, do you also think to obtain approval for things like:
  - You decide that an eligibility criterion is unnecessary and does not affect scientific integrity or participant safety, so you decide not to do it.
  - You find that it's more convenient for your participants if you combine or reorganize study visits, so you reorganize your study activities schedule (even if the overall procedures remain the same).
  - Your "minor changes" in your protocol activities or schedules have now created discrepancies in the informed consent form.
  - Once you start using your data collection forms (DCFs) (the ones you uploaded into BRAAN/CICERO) you find that they are not well-fitted to your visits/activities, so you change them, however they no longer capture the criteria and activities specified in your procedures section.
  - When you begin accessing a VA database or VA medical records stated in your protocol, you find that there is another piece of data that would be helpful.
  - Your phone screen script for recruitment does not seem to be working, so you change the questions.

- You decide that something listed in your protocol is no longer necessary and you decide to stop doing it.

This is NOT an all-inclusive list. However, it is a sampling of the types of issues found in regulatory audits conducted by our Office of Research Compliance (ORC) and the UMB HRPO.

- This is NOT a VA-specific requirement!! UMB HRPO auditors follow the same basic standards and will require similar corrective actions.

- The Copy-Paste Pitfall:
  - It is tempting to copy and paste from an "old" protocol submission to a new protocol submission with the assumption that you will remember to change all the parts that apply to the new study. This frequently results in differences between what you have entered into BRAAN/CICERO and what you actually plan to do in your new study.
  - This also happens when you use data collection forms (DCFs) used for prior studies or templated DCFs from your Centers or Cores. Frequently the standard/prior DCFs have not been adapted to the new study. This leads to problems with source documentation for eligibility criteria and study activities.
  - Use copy-paste with GREAT caution. Be sure to review the CICERO protocol, DCFs and other documents to be sure that they truly fit your study's activities and requirements.
  - What you enter or upload into CICERO becomes what you MUST do for your study unless and until you amend it in CICERO.

- Submitting amendments to R&D Committee (RDC)
  - As soon as your amendment is approved by the IRB, submit it to the RDC.
  - To submit your amendment, obtain the "Worksheet for R&D Submission" from the Research Service website: http://www.maryland.research.va.gov/research/human/human_subject_forms.asp. Then follow the instructions on the worksheet to determine whether additional documentation will be necessary.
  - If you submit the amendment to RDC within 10 working days of IRB approval, you may proceed with the amended procedures without interruption at the VA.

- It is possible that some amendments may need additional review at the VAMHCS; however, these additional reviews will not necessarily delay implementation of the amendment. These include changes in information security, privacy, drug dispensing, PI (VA mandatory trainings), etc. The RDC Administrator, Barbara Calabrese (Barbara.calabrese@va.gov), can help you with questions on your amendment.

- Source Documentation
  - Be sure that you have source documentation for ALL eligibility criteria. Design or adapt your Data Collection Forms (DCFs) to capture eligibility criteria or use other documentation such as lab reports, progress notes, etc.
  - If an eligibility criterion is very specific, then be sure that your source documentation is also specific. For example, if a specific type of stroke is listed in your inclusion or exclusion criteria, then a general item on a medical history form such as "history of stroke" is not adequate. Therefore, the medical history form should be revised to include the specific stroke injury OR be sure that the specific stroke injury is captured elsewhere in your documentation.
  - Remember that the IRB REQUIRES that the eligibility checklist be printed out from CICERO, signed by the PI at the time that a participant is selected for the study, AND must be placed into the participant's study records.
  - The following Research Service guidance might be helpful: "Guidance on Source Documents" (HRP 07.03G), http://www.maryland.research.va.gov/research/human/human_subject_sops.asp.

Remember:

- **Do ONLY what you submitted in BRAAN and CICERO, no more, no less.**
- **Do it in the exact way that you described in BRAAN and CICERO.**
- **Document what you do (your data collection and progress notes).**
- **Amend your protocol BEFORE making any changes.**
- **Submit the amendment(s) to the RDC as soon as they have been approved by the IRB.**

For questions concerning this or other Research Service Hot Topics OR for adding staff or colleagues to the Hot Topics mailing list, contact:

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Can't put your finger on a past Hot Topic you know would solve your problem? No problem. Check the Hot Topics archive on the Research Service website:
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